

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

IGOR VOLKOV,

Plaintiff,

v.

EDWARD RABER; NICHOLAS SUROIU and/or  
SHARP TRUCKING, INC.,

Defendants.

Civil Action No.:

**NOTICE OF PETITION FOR REMOVAL FROM STATE COURT TO FEDERAL COURT**

TO:

Sander Budanitsky, Esquire  
Law Offices of Sander Budanitsky, LLC  
520 West First Ave  
Roselle, NJ 07203  
**Attorneys for Plaintiff – Igor Volkov**

**PLEASE TAKE NOTICE** that the defendants, Edward Raber; Nicholas Suroiu and/or Sharp Trucking, Inc. (hereinafter referred to collectively as “Petitioners” or “Defendants”), herein files and submits this Notice of Petition for the Removal from State Court to Federal Court in the above matter.

The Notice of Petition for Removal is also being filed with the Superior Court of New Jersey, Law Division, Middlesex County pursuant to 28 U.S.C. §1446 (d).

A Motion to Remove the case from New Jersey State Court to Federal Court will be filed after the Federal Court assigns this matter a Civil Action Number.

CIPRIANI & WERNER, P.C.

/s/ Marc R. Jones

MATTHEW K. MITCHELL, ESQUIRE

MARC R. JONES, ESQUIRE

Attorneys for Defendants – Raber; Suroiu and/or Sharp Trucking

155 Gaither Drive – Suite B

Mount Laurel, NJ 08054

856-761-3800

[mmitchell@c-wlaw.com](mailto:mmitchell@c-wlaw.com)

[mjones@c-wlaw.com](mailto:mjones@c-wlaw.com)

DATED: April 10, 2012

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

IGOR VOLKOV,

Plaintiff,

v.

EDWARD RABER; NICHOLAS SUROIU and/or  
SHARP TRUCKING, INC.,

Defendants.

Civil Action No.:

**PETITION FOR REMOVAL FROM STATE COURT TO FEDERAL COURT**

Petitioners or Defendants, Edward Raber; Nicholas Suroiu and/or Sharp Trucking, Inc., hereby file the within Petition for Removal to the United States District Court of New Jersey from the Superior Court of New Jersey, Law Division – Middlesex County, and hereby says:

1. On or about February 28, 2012, Plaintiff filed a Complaint against the Defendants in the Superior Court of New Jersey, Law Division – Middlesex County entitled Volkov v. Raber, et al., under docket number MID-L-1358-12. (**Exhibit “A,”** copy of the filed Complaint)
2. Defendant, Nicholas Suroiu and/or Sharp Trucking received a copy of the Complaint on or about April 3, 2012. (**Exhibit “B”**)
3. To date, no proof of service for any defendant has been filed with the Court based on a review of the State Court public access system. (**Exhibit “C”**)
4. Plaintiff is seeking damages for (2) motor vehicle accidents allegedly involving the same vehicles that occurred on January 13, 2011. (**Exhibit “D,”** copy of the police accident report)
5. The first accident occurred when Plaintiff alleged that the vehicle being driven by Mr. Raber made a wide turn and struck the front of his vehicle causing property damage. (**Exhibit “D”**)
6. The second accident occurred when Plaintiff drove in pursuit of the tractor trailer being driven by Mr. Raber and he intentionally struck the tractor trailer to “get his attention”. (**Exhibit “D”**)
7. Plaintiff, upon information and belief, is a resident of the State of New Jersey. (**Exhibit “A”**)

8. Defendant, Edward Raber, is a resident of the Commonwealth of Pennsylvania, residing at 1155 March Street, Sharon, Pennsylvania. (**Exhibit "D"**)

9. Defendant/owner of the tractor trailer, Nicholas Suroiu and/or Sharp Trucking, Inc. is a commercial trucking company that is incorporated in the State of Ohio with its principal place of business located at 3816 Wilson-Sharpville Road, Cortland, Ohio. (**Exhibit "D"**)

10. The present case is a civil action in which the United States District Court for the District of New Jersey has original jurisdiction by virtue of diversity of citizenship of the parties pursuant to 28 U.S.C. §1332.

11. Pursuant to 28 U.S.C. §1332, this case involves injuries which, as alleged, will exceed \$75,000.00 exclusive of interest and costs, as Plaintiff has made a settlement demand of \$175,000.00. (**Exhibit "E,"** copy of Plaintiff's demand letter dated January 30, 2012)

12. Also, pursuant to 28 U.S.C. §1332 (a) (3) this case involves parties who are citizens of different states. (**Exhibit "D"**)

13. In accordance with the applicable Federal Rules of Civil Procedure and/or Federal Statutes, specifically 28 U.S.C.S. §1446 (b), this Notice for Removal has been filed within (30) days after the Petitioners/Defendants received notice of Plaintiff's Complaint. *See Granovsky v. Pfizer, Inc., et al.*, 631 F.Supp.2d 554, 559 (D.N.J. 2009)

14. Accordingly, pursuant to 28 U.S.C. §1332, this matter is a civil action that may be removed by the Petitioner's/Defendants, Edward Raber; Nicholas Suroiu and/or Sharp Trucking, Inc. from state court to the United States District Court for the District of New Jersey over which the federal court has original jurisdiction.

**WHEREFORE**, Petitioners/Defendants, Edward Raber; Nicholas Suroiu and/or Sharp Trucking, Inc., hereby respectfully request that the aforementioned civil action commenced against them by Plaintiff, be removed to the United States District Court for the District of New Jersey for all further proceedings.

Respectfully submitted,

CIPRIANI & WERNER, P.C.

/s/ Marc R. Jones

MATTHEW K. MITCHELL, ESQUIRE

MARC R. JONES, ESQUIRE

Attorneys for Defendants – Raber; Suroiu and/or Sharp Trucking

155 Gaither Drive – Suite B

Mount Laurel, NJ 08054

856-761-3800

[mmitchell@c-wlaw.com](mailto:mmitchell@c-wlaw.com)

[mjones@c-wlaw.com](mailto:mjones@c-wlaw.com)

DATED: April 10, 2012

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

IGOR VOLKOV,

Plaintiff,

v.

EDWARD RABER; NICHOLAS SUROIU and/or  
SHARP TRUCKING, INC.,

Defendants.

Civil Action No.:

**CERTIFICATION OF FILING AND SERVICE OF NOTICE OF PETITION FOR REMOVAL  
FROM STATE COURT TO FEDERAL COURT**

The undersigned hereby certifies and confirms that the Notice of Petition for Removal from State Court to Federal Court on behalf of the defendants, Edward Raber; Nicholas Suroiu and/or Sharp Trucking, Inc., was e-filed with the United States District Court of New Jersey on April 10, 2012 and that a hard copy was also sent to the Clerk of the Superior Court of New Jersey, Law Division, Middlesex County, and counsel for Plaintiffs via New Jersey Lawyers' Service at the following addresses:

Clerk – Superior Court of New Jersey  
Middlesex County Court House  
56 Paterson Street  
P.O. Box 964 – 1<sup>st</sup> Floor  
New Brunswick, NJ 08902

Sander Budanitsky, Esquire  
Law Offices of Sander Budanitsky, LLC  
520 West First Ave  
Roselle, NJ 07203  
**Attorneys for Plaintiff – Igor Volkov**

I am aware that the foregoing statements made by me are true.

I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

CIPRIANI & WERNER, P.C.

/s/ Marc R. Jones

MATTHEW K. MITCHELL, ESQUIRE

MARC R. JONES, ESQUIRE

Attorneys for Defendants – Raber; Suroiu and/or Sharp Trucking

155 Gaither Drive – Suite B

Mount Laurel, NJ 08054

856-761-3800

[mmitchell@c-wlaw.com](mailto:mmitchell@c-wlaw.com)

[mjones@c-wlaw.com](mailto:mjones@c-wlaw.com)

DATED: April 10, 2012

## **EXHIBIT “A”**

LAW OFFICES OF SANEER BUDANITSKY, LLC  
520 WEST FIRST AVENUE  
ROSELLE, NEW JERSEY 07203  
(908) 241-3445 \* FAX (908) 241-4595  
ATTORNEY FOR PLAINTIFF(S)

IGOR VOLKOV,

Plaintiff(s),

v.

EDWARD RABER, NICHOLAS SUROTV  
and/or SHARP TRUCKING, INC.,

Defendant(s),

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - MIDDLESEX COUNTY

DOCKET NO.:

L-1358-12

CIVIL ACTION

COMPLAINT AND JURY DEMAND

Plaintiff, IGOR VOLKOV, residing in the City of East Brunswick, County of Middlesex and State of New Jersey, by way of complaint, against the Defendants, says:

FIRST COUNT

1. On or about the 13<sup>th</sup> day of January 2011, the Plaintiff, IGOR VOLKOV, was the operator of a motor vehicle, which was traveling Brunswick Avenue near and about its intersection with Bayway in the City of Elizabeth, County of Union and State of New Jersey.



2. At the above time and place, the Defendant, EDWARD RABER, was the operator of a motor vehicle owned by the Defendant, NICHOLAS SUROIV and/or SHARP TRUCKING, INC., which was traveling near the aforesaid vicinity.

3. At all times relevant and material to this Complaint, the Defendant(s), EDWARD RABER, operated the motor vehicle owned by the Defendant, NICHOLAS SUROIV and/or SHARP TRUCKING, INC., with the permission and consent, express or implied, of said owner.

4. At all times relevant and material hereto, the Defendant, EDWARD RABER, was an employee, agent and/or servant of the Defendant, NICHOLAS SUROIV and/or SHARP TRUCKING, INC., acting within the scope of his/her employment and/or agency.

5. At the above time and place, the Defendant, EDWARD RABER, failed to keep his/her vehicle under reasonable and proper control and so carelessly, recklessly and negligently operated his/her motor vehicle, among other things, failing to make proper observations, driving at an excessive rate of speed, and being otherwise inattentive, so as to cause his/her motor vehicle to violently collide with the Plaintiff's vehicle.


6. This accident resulted solely from the negligence and carelessness of the Defendant(s) herein and was due in no part on any act, or failure to act, on the part of the Plaintiff(s).

7. As a direct and proximate result of the foregoing, the Plaintiff, IGOR VOLKOV, was caused to sustain serious, painful and permanent injuries, has experienced great pain and suffering, has suffered great shock and mental anguish, will in the future

experience great pain and suffering, was caused to incur great expenses for medical care and attention, will in the future incur additional expenses, was caused to lose large sums of money for wages he would have earned but for his injuries and will in the future lose large sums of money for wages, and has in the past, and will in the future, lose his right to the full enjoyment of life.

WHEREFORE, the Plaintiff, IGOR VOLKOV, hereby demands judgment against the Defendants, EDWARD RABER, NICHOLAS SUROIV and/or SHARP TRUCKING, INC., both jointly and severally, together with interest and cost of suit.


DATED: February 22, 2012

  
Sander Budanitsky, Esq.  
Attorney for the Plaintiff(s)

JURY DEMAND

Plaintiff demands a trial by jury as to all Counts of the within Complaint.


DATED: February 22, 2012

  
Sander Budanitsky, Esq.  
Attorney for the Plaintiff(s)

CERTIFICATION OF NO OTHER ACTIONS


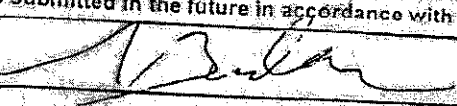
Pursuant to Rule 4:5-1, it is stated that the matter in controversy is not the subject to any other action pending in any other court or of a pending arbitration proceeding to the best of my knowledge or belief. Also, to the best of our belief, no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this pleading, I know of no other parties that should be joined in the above action. In addition, we recognize the continuing obligation of each party to file and serve on all parties and the Court an amended certification if there is a change in the facts stated in this original certification.

DATED: February 22, 2012

  
Sander Budanitsky, Esq.  
Attorney for the Plaintiff(s)



## Appendix XII-B1

CIVIL CASE INFORMATION STATEMENT (CIS)		FOR USE BY CLERKS OFFICE ONLY	
 <p>Use for Initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1 Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed.</p>		<p>PAYMENT BY SUPERIOR COURT CLERK CHECK MIDDLESEX COUNTY RECEIVED &amp; FILED AMOUNT: FEB 28 2012 OVERPAYMENT: BATCH: JERRY EDWARDS DEPUTY CLERK</p>	
ATTORNEY / PRO SE NAME Sander Budanitsky, Esq.	TELEPHONE NUMBER (908) 241-3445	COUNTY OF VENUE Middlesex	
FIRM NAME (if applicable) Law Offices of Sander Budanitsky, LLC	DOCKET NUMBER (when available)		
OFFICE ADDRESS 520 West First Avenue Roselle, NJ 07203	DOCUMENT TYPE Complaint		
NAME OF PARTY (e.g., John Doe, Plaintiff) Igor Volkov, plaintiff	CAPTION Igor Volkov vs. Sharp Trucking, Inc., et al		
CASE TYPE NUMBER (See reverse side for listing) 603N	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT. IF YES, LIST DOCKET NUMBERS		
RELATED CASES PENDING? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) MAXUM		<input type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN	
<b>THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.</b>			
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION			
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input checked="" type="checkbox"/> FACILITATOR <input type="checkbox"/> BUSINESS	
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION Plaintiff was injured as a result of a MVA.			
DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION	
WILL AN INTERPRETER BE NEEDED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		IF YES, FOR WHAT LANGUAGE? Russian	
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).			
ATTORNEY SIGNATURE: 			

Side 2



# CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under Rule 4.5-1

**CASE TYPES** (Choose one and enter number of case type in appropriate space on the reverse side.)

**Track I - 150 days' discovery**

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 899 OTHER (briefly describe nature of action)

**Track II - 300 days' discovery**

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT - OTHER

**Track III - 450 days' discovery**

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

**Track IV - Active Case Management by Individual Judge / 450 days' discovery**

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

**Centrally Managed Litigation (Track IV)**

- 280 ZELNORM
- 285 STRYKER TRIDENT HIP IMPLANTS
- 288 PRUDENTIAL TORT LITIGATION
- 289 REGLAN

- 290 POMPTON LAKES ENVIRONMENTAL LITIGATION
- 291 PELVIC MESH/GYNECARE
- 292 PELVIC MESH/BARD
- 293 DEPUY ASR HIP IMPLANT LITIGATION

**Mass Tort (Track IV)**

- 248 CIBA GEIGY
- 266 HORMONE REPLACEMENT THERAPY (HRT)
- 271 ACCUTANE/ISOTRETINOLIN
- 274 RISPERDAL/SEROQUEL/ZYPREXA
- 276 ZOMETHA/ARAVIA
- 279 GADOLINIUM

- 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL
- 282 FOSAMAX
- 284 NUVARING
- 286 LEVAQUIN
- 287 YAZ/YASMIN/LOCELLA
- 601 ASBESTOS

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category. ☐ Putative Class Action ☐ Title 59

Law Offices of Sander Budanitsky, LLC

520 West First Avenue  
Roselle, New Jersey 07203  
Tel: (908) 241-3445  
Fax: (908) 241-4595

Sander Budanitsky\*

Kimberly A. Rudolph\*  
Of Counsel

\* Also admitted in Pennsylvania

[www.sbnjlaw.com](http://www.sbnjlaw.com)

March 19, 2012

VIA REGULAR & CERTIFIED MAIL, RRR  
SHARP TRUCKING, INC.  
3861 Wilson Sharpville Road  
Cortland, OH 44410

RE: Igor Volkov vs. Edward Raber, et al  
Docket No.: MID-L-1358-12

Dear Sir/Madam:

Please be advised that our office has been retained to represent the interest of Igor Volkov with regard to the above referenced matter.

Enclosed please find a Summons and Complaint which is being served upon you pursuant to Rule 4:4-4 of the Rules of the Court Governing the State of New Jersey. Please be further advised that you have thirty five (35) days to file an Answer. If you do not file an Answer within (35) days, Default will be entered against you.

Upon receipt of this Summons & Complaint kindly forward a copy of same to your Insurance Carrier at the time of the loss.

Thank you for your time and attention.

Very truly yours,

/s/ Sander Budanitsky

Sander Budanitsky

SB/cc

w/encl.



LAW OFFICES OF SANDER BUDANTISKY, LLC  
520 WEST FIRST AVENUE  
ROSELLE, NEW JERSEY 07203  
(908)241-3445 \* FAX (908)241-4595  
ATTORNEY FOR PLAINTIFF

IGOR VOLKOV,

SUPERIOR COURT OF NEW JERSEY  
MIDDLESEX COUNTY - LAW DIVISION

Plaintiff(s),

DOCKET NO.: MID-L-1358-12

VS.

EDWARD RABER, NICHOLAS SUROIV  
and SHARP TRUCKING, INC.,

CIVIL ACTION

SUMMONS

Defendant(s),

From the State of New Jersey, To the Defendant Named Above: SHARP TRUCKING, INC.

The Plaintiff named above, has filed a lawsuit against you in the Superior Court of New Jersey. The Complaint attached to this summons states the basis for this lawsuit. If you dispute this Complaint, you or your attorney must file a written Answer or Motion and proof of service with the Deputy Clerk of the Superior Court of New Jersey in the county listed above within 35 days from the date you received this Summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) An \$135.00 filing fee payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your Answer or Motion when it is filed. You must also send a copy of your Answer or Motion to the Plaintiff's attorney whose name and address appear above, or to the Plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file a written Answer or Motion if you want the court to hear your defense.

If you do not file and serve a written Answer or Motion within 35 days from the date of service, the court may enter Default of Judgment against you for the relief that the Plaintiff demands, together with interests and costs of suit. If Judgment is entered against you, the Sheriff may seize your money, wages, or property to pay all or part of the Judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of the numbers is also provided.

Dated: March 19, 2012

JENNIFER PEREZ  
Clerk of the Superior Court

Name of Defendants to be served: SHARP TRUCKING, INC.

Address of Defendants to be served: 3861 Wilson Sharpville Road  
Cortland, OH 44410

**ATLANTIC COUNTY:**

Deputy Clerk of the Superior Court  
Civil Division, Direct Filing  
1201 Bacharach Blvd., First Fl.  
Atlantic City, NJ 08401  
LAWYER REFERRAL  
(609) 345-3444  
LEGAL SERVICES  
(609) 348-4200

**CUMBERLAND COUNTY:**

Deputy Clerk of the Superior Court  
Civil Case Management Office  
Broad & Fayette Sts., P.O. Box 615  
Bridgeport, NJ 08302  
LAWYER REFERRAL  
(856) 692-6207  
LEGAL SERVICES  
(856) 451-3003

**MERCER COUNTY:**

Deputy Clerk of the Superior Court  
175 S. Broad Street  
P. O. Box 8068  
Trenton, NJ 08650  
LAWYER REFERRAL  
(609) 585-6200  
LEGAL SERVICES  
(609) 695-6249

**SALEM COUNTY:**

Deputy Clerk of the  
Superior Court  
92 Market St., P.O. Box 18  
Salem, NJ 08079  
LAWYER REFERRAL  
(856) 678-8363  
LEGAL SERVICES  
(856) 451-3003

**BERGEN COUNTY:**

Deputy Clerk of the Superior Court  
Case Processing Section, Rm 119  
Justice Center, 10 Main St.  
Hackensack, NJ 07601-7698  
LAWYER REFERRAL  
(201) 488-0044  
LEGAL SERVICES  
(201) 487-2166

**ESSEX COUNTY:**

Deputy Clerk of the Superior Court  
50 West Market Street  
Room 131  
Newark, NJ 07102  
LAWYER REFERRAL  
(973) 622-6207  
LEGAL SERVICES  
(973) 624-4500

**MIDDLESEX COUNTY:**

Deputy Clerk of the Superior Court  
Administration Building  
Third Floor  
1 Kennedy Sq., P. O. Box 3533  
New Brunswick, NJ 08903-2633  
LAWYER REFERRAL  
(732) 828-0053  
LEGAL SERVICES  
(732) 249-7600

**SOMERSET COUNTY:**

Deputy Clerk of the  
Superior Court  
Civil Division Office  
New Court House, 3<sup>rd</sup> Fl.  
P. O. Box 3000  
Somerville, NJ 08876  
LAWYER REFERRAL  
(908) 685-2323  
LEGAL SERVICES  
(908) 231-0840

**BURLINGTON COUNTY:**

Deputy Clerk of the Superior Court  
First Fl., Courts Facility  
49 Rancocas Rd.  
Mt. Holly, NJ 08060  
LAWYER REFERRAL  
(609) 261-4862  
LEGAL SERVICES  
(609) 261-1088

**GLOUCESTER COUNTY:**

Deputy Clerk of the Superior Court  
Civil Case Management Office  
Altus Intake  
First Fl., Court House  
1 North Broad Street  
P. O. Box 129  
Woodbury, NJ 08096  
LAWYER REFERRAL  
(856) 848-4589  
LEGAL SERVICES  
(856) 848-5360

**MONMOUTH COUNTY:**

Deputy Clerk of the Superior Court  
71 Monument Park  
P. O. Box 1269  
Freehold, NJ 07728-1269  
LAWYER REFERRAL  
(732) 431-5544  
LEGAL SERVICES  
(732) 866-0020

**SUSSEX COUNTY:**

Deputy Clerk of the  
Superior Court  
43-47 High Street  
Newton, NJ 07860  
LAWYER REFERRAL  
(973) 267-5882  
LEGAL SERVICES  
(973) 383-7400

**CAMDEN COUNTY:**

Deputy Clerk of the Superior Court  
1<sup>st</sup> Fl., Hall of Records  
101 S. Fifth St.  
Camden, NJ 08103  
LAWYER REFERRAL  
(609) 964-4520  
LEGAL SERVICES  
(609) 964-2010

**HUDSON COUNTY:**

Deputy Clerk of the Superior Court  
Superior Court  
Civil Records Dept.  
Brennan Court House, 1<sup>st</sup> Fl.  
583 Newark Ave.  
Jersey City, NJ 07306  
LAWYER REFERRAL  
(201) 798-2727  
LEGAL SERVICES  
(201) 792-6363

**MORRIS COUNTY:**

Deputy Clerk of the Superior Court  
Civil Division  
30 Schuyler Pl., P. O. Box 910  
Morristown, NJ 07960-0910  
LAWYER REFERRAL  
(973) 267-5882  
LEGAL SERVICES  
(973) 285-6911

**UNION COUNTY:**

Deputy Clerk of the Superior Court  
1<sup>st</sup> Fl., Court House  
2 Broad Street  
Elizabeth, NJ 07207  
LAWYER REFERRAL  
(908) 353-4715  
LEGAL SERVICES  
(908) 354-4340

**CAPE MAY COUNTY:**

Deputy Clerk of the Superior Court  
9 N. Main Street  
Box DN-209  
Cape May Court House, NJ  
08210  
LAWYER REFERRAL  
(609) 463-0313  
LEGAL SERVICES  
(609) 465-3001

**HUNTERDON COUNTY:**

Deputy Clerk of the Superior Court  
Civil Division  
65 Park Street  
Flemington, NJ 08822  
LAWYER REFERRAL  
(609) 735-2611  
LEGAL SERVICES  
(609) 782-7979

**OCEAN COUNTY:**

Deputy Clerk of the Superior Court  
Court House, Room 119  
118 Washington Street  
Toms River, NJ 08754  
LAWYER REFERRAL  
(732) 240-3666  
LEGAL SERVICES  
(732) 341-2727

**WARREN COUNTY:**

Deputy Clerk of the Superior Court  
Civil Division Office  
Court House  
413 Second Street  
Belvidere, NJ 07823-1509  
LAWYER REFERRAL  
(973) 267-5882  
LEGAL SERVICES  
(973) 475-2010

**PASSAIC COUNTY:**

Deputy Clerk of the Superior Court  
Civil Division, Court House  
77 Hamilton St.  
Paterson, NJ 07505  
LAWYER REFERRAL  
(973) 278-9223  
LEGAL SERVICES  
(973) 345-7171



MIDDLESEX VICINAGE CIVIL DIVISION  
P O BOX 2633  
55 PATERSON STREET  
NEW BRUNSWICK NJ 08903-2633

COURT TELEPHONE NO. (732) 519-3728  
COURT HOURS

TRACK ASSIGNMENT NOTICE

DATE: FEBRUARY 29, 2012  
RE: VOLKOV IGOR VS REBER EDWARD  
DOCKET: MID L -001158 12

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS  
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON RICHARD F. PLECHNER

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 062  
AT: (732) 519-3737 EXT 3737.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A  
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.  
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE  
WITH R.4:5A-2.

ATTENTION:

ATT: SANDER BUDANITSKY  
BUDANITSKY LAW OFFICE SANDER  
520 WEST FIRST AVE  
ROSELLE NJ 07203-1028

JUDGE

## EXHIBIT "B"

**Marc R. Jones**

---

**From:** Beth Vickers [<mailto:bvickers@loveinsurance.com>]  
**Sent:** Tuesday, April 03, 2012 4:22 PM  
**To:** Sforzo, Rick  
**Subject:** Sharp Trucking Claim #TRK6297-04-03

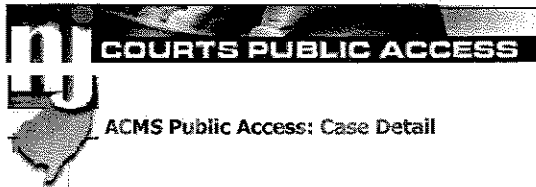
Lawsuit papers attached.

Thank you,

*Beth Vickers*

Love Insurance Agency  
34920 Ridge Rd, Suite 100  
Willoughby, OH 44094  
Phone: 440-975-0309  
Toll Free: 877-859-3073  
Direct Fax #: 440-527-5005  
[bvickers@loveinsurance.com](mailto:bvickers@loveinsurance.com)

## **EXHIBIT “C”**



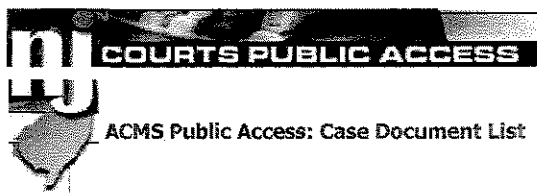
VENUE: MIDDLESEX COURT: LAW CVL DOCKET #: L 001358 12  
CASE TITLE : VOLKOV IGOR VS RABER EDWARD

CASE FILED DATE : 02 28 2012	CASE TYPE : 603 AUTO NEG T
CASE STATUS : ACTIVE	CASE INITIATION TYPE: C COMPLAINT
DISPOSITION TYPE :	DATE DISPOSED : 00 00 0000
DISCOVERY DATE :	ARGUMENT REQST DATE : 00 00 0000
CASE PARTY COUNT : 004	JUDGMENT ENTERED : NO

FIRST ANSWER DATE :	ACTUAL SERVICE DATE :
EXPECTD SERVICE DATE:	CONSOLIDATION STATUS:
CONSOLIDATION TYPE :	DATE TRANSFERRED OUT:
TRANSFER FROM VENUE : TO	LAST PROCEEDING DATE:
PENDING ACTION : PG SERVICE	PENDING ACTION DATE : 03 09 2012
UNDISTRIBUTED AMOUNT: 0.00	DEMAND AMOUNT : 0.00
DF ATTORNEY/PRO SE : NO DF HAS AN ATT	DENOVO INDICATOR : NO

CMP DISPUTE RESOLUTN: AUTO ARBITRATION	TITLE 59 INDICATOR : NO
JURY REQUEST : 6 JURORS	CASE IMPOUNDED : NO
DATE ENTERED : 02 29 2012	

Screen ID:CVM1019 Copyrighted © 2008 - New Jersey Judiciary  
BUILD 2011.1.0.0.12



Page: 1

END OF LIST

VENUE : MIDDLESEX COURT : LAW CVL DOCKET #: L 001358 12 CASE TITLE : VOLKOV IGOR VS RABER EDWARD											
SEL	DATE FILED		DOC NUM	DOCUMENT TYPE		NON CONF	FILING/TARGET PARTY NAME		ATTORNEY NAME	MUL DOC PTY STA	
<input type="radio"/>	02	28	2012	001	COMP JRY	DEMAND	VOLKOV		BUDANITSKY	L	N

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## **EXHIBIT “D”**





**EXHIBIT "E"**

Law Offices of Sander Budanitsky, L.L.C.

520 West First Avenue

Roselle, New Jersey 07208

Tel: (908) 241-3445

Fax: (908) 241-4595

e-mail: budanitskylaw@gmail.com

Sander Budanitsky \*

Kimberly A. Rudolph \*  
Of Counsel

\* Also admitted in Pennsylvania

January 30, 2012

MAXIM Specialty Insurance Group  
3655 North Point Parkway, Suite 500  
Alpharetta, Georgia 30005  
Attention: Richard V. Sforzo  
Claims Representative

RE: Your Insured: Sharp Trucking Inc  
Claim # T6297-43  
Date of Accident: 01/13/11  
My Client: Igor Volkov

Dear Mr. Sforzo:

As you are aware, this office represents Mr. Volkov, in connection with his claim for personal injuries sustained on January 13, 2011 while involved in a motor vehicle accident. Enclosed please find a copy of the Declaration Page, Police Report and Property Damage Estimated for you records. Please be advised that a claim for Property Damage in the amount of \$4,098.37 is made herein.

Further, enclosed please find a copy of the final Narrative report/bill, medical evaluation, EMG report from Manalapan Medical Center and MRI reports from DRA of Edison.

Also, please be advised plaintiff has incurred bills which total \$59,816.67 to date. The bills are as follows:

Raritan Bay Medical Center.....	\$2,680.00
Bayview Emergency Associates.....	\$ 386.00
DRA of Edison.....	\$2,964.00
Manalapan Medical Center.....	\$20,575.01

Please be advised that these bills remains outstanding.

In accordance with Diagnostic Testing and doctors' reports, my client sustained as a direct result of the accident on August 26, 2010, the following injuries: Disc herniation at L3-L4, L5-S1 with grade I anterolistheis, bilateral L4, L5 and S1 radiculopathy, disc herniation at C4-C5, C5-C6, C6-C7 and bilateral C5, C6 and C7 radiculopathy. These injuries are permanent in nature.

Based upon the foregoing and based upon absolute liability on the part of your insured, demand is hereby made solely on an amicable out-of-court settlement in the amount of \$175,000.00. After you have an opportunity to review the enclosed medicals, kindly contact me, so we may discuss same. Thank you for your anticipated courtesy and cooperation.

Very truly yours,

  
SANDER BUDANITSKY

SB:luz